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*Attorneys for Plaintiff*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION

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| <p>RANCHERS-CATTLEMEN<br/>ACTION LEGAL FUND, UNITED<br/>STOCKGROWERS OF AMERICA,<br/>Plaintiff,</p> <p>v.</p> <p>TOM VILSACK, IN HIS OFFICIAL<br/>CAPACITY AS SECRETARY OF<br/>AGRICULTURE, AND THE<br/>UNITED STATES DEPARTMENT<br/>OF AGRICULTURE,<br/>Defendants.</p> | <p>Case No. CV-16-41-GJ-BMM-JTJ</p> <p><b>OPPOSITION TO<br/>DEFENDANTS' MOTION TO<br/>DISMISS OR, IN THE<br/>ALTERNATIVE STAY THE<br/>CASE<br/>&amp;<br/>PLAINTIFF'S CROSS-MOTION<br/>FOR SUMMARY JUDGMENT<br/>OR, IN THE ALTERNATIVE,<br/>FOR A PRELIMINARY<br/>INJUNCTION</b></p> |
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Plaintiff, the Ranchers-Cattlemen Action Legal Fund, United Stockgrowers of America, pursuant to Federal Rules of Civil Procedure 56 and 65, as well as this Court's inherent equitable powers, hereby moves for summary judgment and the entry of a declaratory judgment and injunctive relief. In the alternative, pursuant to Federal Rule of Civil Procedure 65 and this Court's inherent equitable powers, Plaintiff moves for a preliminary injunction. The grounds for this motion are set forth in the accompanying statement of undisputed facts, related exhibits, and memorandum, which also serves as Plaintiff's Opposition to Defendants' Motion to Dismiss, or, in the Alternative, Stay the Case, Dkt. No. 19.

Pursuant to Local Rule 7.1(c)(1), the undersigned conferred with counsel for Defendants regarding this motion, and she indicated that Defendants oppose the motion.

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RESPECTFULLY SUBMITTED this 24<sup>th</sup> day of August, 2016.

ROSSBACH LAW, PC

By: /s/ William A. Rossbach  
William A. Rossbach

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